

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MASSACHUSETTS

	I	
RIMMA VAKS	I	
Plaintiff,	I	
	I	
v.	I	Civil Action
	I	<u>1:18-cv-12571-LTS</u>
TOM QUINLAN, DORIAN LEBLANC and	I	<u>JURY TRIAL DEMAND</u>
LUMIRADX	I	
Defendants	I	
	I	

**PLAINTIFF'S MOTION TO COMPEL DISCOVERY. ADMIT
REQUESTS FOR ADMISSIONS AND SANCTION DEFENDANT
AND ITS COUNSELS**

Now comes Plaintiff, Rimma Vaks, and Pursuant to Rule 37(a) of the Federal Rules of Civil Procedure moves this Court to compel discovery pursuant to Rules 30, 33, 34, 36 and 37 of the Federal Rules of Civil Procedure.

Plaintiff further moves to allow admissions to be admitted for non-compliance with the Rule 36. Plaintiff further moves to impose sanction against Defendant due to its pattern of non-compliance with Rules 30, 33, 34 and 36.

Plaintiff further moves this Court to impose sanction against Defendant for violation of subpoena power.

Plaintiff further moves this Court to impose sanction against Defendant's counsels for not producing deposition witnesses under Rule 37 and 45.

A supporting memorandum accompany this Motion.

Dated: 7 January, 2020

Respectfully submitted,

/s/ Rimma Vaks
Rimma Vaks, *Pro Se*
103 Puritan Lane
Swampscott, MA 01907
Phone: (781) 581-6994
Rimma.vaks@verizon.net